

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	
Telecommunications Carriers Eligible to Receive Universal Service Support	WC Docket No. 09-197
Lifeline and Link Up Reform and Modernization	WC Docket No. 11-42
North American Local, LLC Compliance Plan	

**FURTHER AMENDED NORTH AMERICAN LOCAL, LLC COMPLIANCE PLAN**

North American Local, LLC (“North American Local” or the “Company”), through its undersigned counsel, hereby respectfully submits and requests expeditious approval of its Further Amended Compliance Plan outlining the measures it will take to implement the conditions imposed by the Commission in its *Lifeline Reform Order*.<sup>1</sup>

The Company commends the Commission’s commitment to a nationwide communications system that promotes the safety and welfare of all Americans, including Lifeline customers. The Company has received forbearance from the facilities requirement of

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<sup>1</sup> See *Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report And Order and Further Notice Of Proposed Rulemaking, FCC 12-11 (Feb. 6, 2012) (“*Lifeline Reform Order*”). The Company herein submits the information required by the Compliance Plan Public Notice. See *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 12-314 (rel. Feb. 29, 2012).

section 214(e)(1)(A) of the Communications Act<sup>2</sup> and intends to participate as an eligible telecommunications carrier (“ETC”) in the Lifeline program.<sup>3</sup>

The Company will comply fully with all conditions set forth in the *Lifeline Reform Order*, as well as with the Commission’s Lifeline rules and policies more generally.<sup>4</sup> This Compliance Plan describes the specific measures that the Company intends to implement to achieve these objectives. Specifically, this Compliance Plan: (1) describes the specific measures that the Company will take to implement the obligations contained in the *Lifeline Reform Order*, including the procedures the Company will follow in enrolling a subscriber in Lifeline and submitting for reimbursement for that subscriber from the Low-Income Fund, materials related to initial and ongoing certifications and sample marketing materials; and (2) provides a detailed description of how the Company will offer Lifeline services, the geographic areas in which it will offer services, and a detailed description of the Company’s Lifeline service plan offerings.

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<sup>2</sup> See *Lifeline Reform Order*, ¶ 520.

<sup>3</sup> See *Lifeline Reform Order*, ¶ 368. Although North American Local qualifies for and has been granted forbearance from the facilities requirement of section 214(e)(1)(A) for purposes of the federal Lifeline program, the Company reserves the right to demonstrate to a state public utilities commission that it provides service using its own facilities in a state for purposes of state universal service funding under state program rules and requirements. The Company will follow the requirements of the Commission’s Lifeline rules and this Compliance Plan in all states in which it provides Lifeline service and receives reimbursements from the federal Low-Income Fund, including in any state where the public utilities commission determines that North American Local provides service using its own facilities for purposes of a state universal service program.

<sup>4</sup> In addition, this Compliance Plan is consistent with the compliance plan filed by Global Connection Inc. of America. See Global Connection of America Inc. Compliance Plan, WC Docket Nos. 09-197, 11-42 (Apr. 30, 2012). The Global Connection compliance plan was approved on May 25, 2012. See Public Notice, DA 12-828.

## **SUMMARY**

The Company seeks Commission approval of its Further Amended Compliance Plan outlining the measures it will take to implement the conditions imposed by the Commission in its Lifeline Reform Order. Since commencing service in 2010, the Company sought and received ETC designation in Alabama and Wisconsin<sup>5</sup> and now provides Lifeline and non-Lifeline wireline and wireless services to more than 10,000 customers.<sup>6</sup> 75% of North American Local's customer base, including approximately 7500 tribal residents, is qualified to receive Lifeline benefits. As disclosed below, the Company's Lifeline benefits include 300 anytime minutes and a free Wi-Fi capable smart phone. Lifeline offerings to tribal residents include 1000 anytime minutes and a free Wi-Fi capable smart phone.

According to a 2010 U.S. Census American Community Survey, approximately 19% of American Indians are without telephone services.<sup>7</sup> In an effort to bridge the well-known communications gap within the tribal community, North American Local has worked very hard to establish, and expand, its relationship with the tribal governments. The Company coordinates directly with various divisions within the tribal governments, including, but not limited to, the Tribal Administrative Offices, Elderly Services, Family Service Centers, Tribal and Tribal Food Distribution Departments and Medicaid Health Services Department, in an attempt to identify, enroll and service tribal residents that need and qualify for Lifeline services.

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<sup>5</sup> North American Local was informed by on July 6, 2016 by Commission Staff in State of Minnesota that we have been recommended for approval as a Facilities-Based ETC and are awaiting final approval by the Commission "within the next 60-90 days".

<sup>6</sup> The Company has yet to receive a single customer complaint in its six years of operation.

<sup>7</sup> This is more than four times the total U.S. population overall, which is approximately 4.0%. See Comments of National Congress of American Indians, WC Docket Nos. 09-197, 10-90, and 11-42, p.3 (filed Aug. 31, 2015).

## **ACCESS TO 911 AND E911 SERVICES**

Pursuant to the *Lifeline Reform Order*, forbearance is conditioned upon the Company: (1) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; and (2) providing its Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services.<sup>8</sup> The Company will comply with these conditions on the first day that it begins providing service.

The Company will provide its Lifeline customers with access to 911 and E911 services immediately upon activation of service. The Company will ensure that Lifeline customers will have 911 and E911 service access upon activation and until termination of service regardless of the number of available minutes on the handset. As a result, the Company will transmit all 911 calls initiated from any of its handsets even if the account associated with the handset has no remaining minutes.

The Company will use Sprint as its underlying wireless network provider/carrier through a wholesale agreement with 321 Communications, a Sprint Mobile Virtual Network Operator (“MVNO”), to serve its non-Lifeline and Lifeline customers. 321 Communications, Inc. is a Jacksonville, Florida-based Sprint MVNO, an interexchange carrier and competitive local exchange carrier.

Sprint will route 911 calls from the Company’s customers in the same manner as 911 calls from its own retail customers. To the extent that Sprint is certified in a given PSAP territory, this 911 capability will function the same for the Company.

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<sup>8</sup> See *Lifeline Reform Order*, ¶ 373.

**E911-Compliant Handsets.** North American Local will ensure that all handsets used in connection with the Lifeline service offering are E911-compliant. All of the Company's phones will be E911-capable handsets. The Company will use phones from various suppliers that have been through a stringent certification process to ensure that the handset models used meet all 911 and E911 requirements. As a result, any new customer that qualifies for and enrolls in the Lifeline program will receive a 911/E911-compliant handset at no extra charge.

### **COMPLIANCE PLAN**

#### **I. Procedures to Enroll a Subscriber in Lifeline<sup>9</sup>**

##### **A. Policy**

North American Local will comply with the uniform eligibility criteria established in new section 54.409 of the Commission's rules, as well as any additional certification and verification requirements for Lifeline eligibility in states where the Company is designated as an ETC.

Therefore, all subscribers will be required to demonstrate eligibility based at least on: (1) household income at or below 135% of the Federal Poverty Guidelines ("FPG") for a household of that size; or (2) the household's participation in one of the federal assistance programs listed in sections 54.409(a)(2) or 54.409(a)(3) of the Commission's rules. In addition, through the certification requirements described below, the Company will confirm that the subscriber is not already receiving a Lifeline service and no one else in the subscriber's household is subscribed to a Lifeline service.

##### **B. Eligibility Determination**

North American Local will enroll<sup>10</sup> customers primarily through three different marketing channels including but not limited to: 1) over the telephone; 2) through online sales at

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<sup>9</sup> See Compliance Plan Public Notice at 3.

[www.northamericanlocal.com](http://www.northamericanlocal.com), and 3) through sales coordinated with the direct assistance of various local tribal governments and/or conducted at North American Local satellite offices collocated within tribal government buildings.<sup>11</sup> Regardless of the enrollment method, each customer must provide the same information via North American Local's standard customer application/certification form discussed below.

The Company will use the MVNO Cloud Solutions Platform enrollment application software. This software will allow the Company to perform several database address and duplicate service checks in real-time during the enrollment process discussed below. The MVNO Cloud Solutions Platform program will allow North American Local to maintain a review queue for applicant information until receipt and review of the applicant's proof of eligibility has been completed by a North American Local quality assurance manager ("QAM"). Customers will be required to submit copies of their government-issued identification and proof of eligibility to the Company by regular mail, fax or electronic mail (scanned version). Upon direct contact with the customer, North American Local employees or representatives ("Company personnel") must log in to the software so that the customer enrollment is automatically associated with a particular employee or representative. The employee or representative then advances through each section of the application with the Lifeline applicant to provide disclosures, to collect information and to elicit certifications as detailed below, which must be read to, and verbally acknowledged by, the applicant. As indicated above, the applicant

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<sup>10</sup> North American Local uses its own employees - not agents - to enroll (and recertify) Lifeline customers. North American Local does not offer its employees any type of incentive for enrolling or recertifying customers into the benefits program.

<sup>11</sup> North American Local works directly with the following tribal governments Bad River Band of Lake Superior Chippewa Indians, Forest County Potawatomi Indian Community, Lac Courte Orielles Band of Lake Superior Chippewa Indians, Lac Du Flambeau Band of Lake Superior Chippewa Indians, Menomonee Indian Tribe of Wisconsin, Oneida Indian Tribe of Wisconsin, Poarch Band of Creek Indians, Red Cliff Band of Lake Superior Chippewa Indians, Stockbridge Munsee Community of Wisconsin and St. Croix Chippewa Indians

information collected is processed through several database checks, including an address verification, a geographic footprint match to the ETC's authorization to provide Lifeline service in the area, an internal duplicate check and a state database eligibility check (if available).

To complete the enrollment, a North American Local QAM will independently review each application and all documentation supporting identity and eligibility within the MVNO Cloud Solutions Platform enrollment application review queue. The MVNO Cloud Solutions Platform review queue will allow the North American Local QAM to view and confirm the captured image of the government issued ID and the proof of eligibility documentation, assuring that they match the information entered on the enrollment form. Once the North American Local QAM has verified the enrollment, the image of proof of eligibility will be retained with the enrollment application<sup>12</sup>. Only enrollments that successfully complete this two-step process will be submitted for reimbursement. Company personnel will follow a script similar to Exhibit C.

Customers who elect to use the online application process will be required to review all mandatory disclosures and review and acknowledge all certifications with a check mark. Once the online application form has been completed, applicants will be required to submit copies of their government-issued identification and proof of eligibility to the Company by regular mail, fax or electronic mail (scanned version). Once a North American Local QAM has verified the enrollment materials as described above, the image(s) of proof of eligibility will be retained with the enrollment application.

As discussed in further detail in Section I.F. below, all Company personnel that conduct Lifeline enrollments are trained regarding the eligibility and certification requirements in the *Lifeline Reform Order* and this Compliance Plan. This training emphasizes the importance of the

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<sup>12</sup> See Lifeline and Link Up Reform and Modernization, 30 FCC Rcd 7818, 7891 (2015) ("...we require ETCs to retain documentation demonstrating subscriber eligibility for the Lifeline Program as well as documentation used in NLAD processes.").

one-per-household limitation and the need to effectively convey that limit to Lifeline applicants. The training also focuses on review and consideration of proof of eligibility requirements.<sup>13</sup>

All personnel who interact with current or prospective customers will be trained to assist Lifeline applicants in determining whether they are eligible to participate based on the federal and state-specific income-based and/or program-based criteria. If unable to determine a prospective subscriber's eligibility for Lifeline by accessing state or federal income or program eligibility databases, Company personnel will review applicant provided documentation establishing eligibility pursuant to the Lifeline rules.<sup>14</sup> These personnel will be trained to answer questions about Lifeline eligibility, and will review required documentation to determine whether it satisfies the *Lifeline Reform Order* and state-specific eligibility requirements using state-specific checklists. Lifeline training will be refreshed as necessary.

Proof of Eligibility. Acceptable documentation of program eligibility includes: (1) the current or prior year's statement of benefits from a qualifying state, federal or Tribal program; (2) a notice letter of participation in a qualifying state, federal or Tribal program; (3) program participation documents (*e.g.*, the consumer's Supplemental Nutrition Assistance Program (SNAP) electronic benefit transfer card or Medicaid participation card (or copy thereof)); or (4) another official document evidencing the consumer's participation in a qualifying state, federal or Tribal program.<sup>15</sup> Acceptable documentation of income eligibility includes the prior year's state, federal, or Tribal tax return; current income statement from an employer or three months of paycheck stubs; a Social Security statement of benefits; a Veterans Administration statement of benefits; a retirement/pension statement of benefits; an Unemployment/Workmen's

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<sup>13</sup> See *Lifeline Reform Order*, ¶ 101. See also USAC Guidance available at <http://www.usac.org/li/telecom-carriers/step06/default.aspx>.

<sup>14</sup> See *Lifeline Reform Order*, ¶ 100; section 54.410(b)(1)(i)(B), 54.410(c)(1)(i)(B).

<sup>15</sup> *Id.* and section 54.410(c)(1)(i)(B).



Compensation statement of benefits; federal or Tribal notice letter of participation in General Assistance; or a divorce decree, child support award, or other official document containing income information for at least three months time.<sup>16</sup>

Company personnel will examine this documentation for each Lifeline applicant, and will record the type of documentation used to satisfy the income- or program-based criteria by checking the appropriate box on the application form.<sup>17</sup> The Company will retain a copy of this documentation.<sup>18</sup> Customers electing to enroll via the Internet, Toll-Free Facsimile, USPS Mail, or Voice/IVR will be required to fax or e-mail proof of eligibility documentation to the Company. Proof will be reviewed by a North American Local QAM prior to service activation and then deleted/destroyed. Where the North American Local QAM concludes that the proffered documentation is insufficient to establish such eligibility, the Company will deny the associated application and inform the applicant of the reason for such rejection. In the event that Company personnel cannot ascertain whether documentation of a specific type is sufficient to establish an applicant's eligibility, the matter will be escalated to supervisory personnel at the Company's corporate headquarters.<sup>19</sup>

De-Enrollment for Ineligibility. If North American Local has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, the Company will notify the subscriber of impending termination in writing and in compliance with any state dispute resolution procedures applicable to Lifeline termination, and give the subscriber 30 days to demonstrate continued eligibility.<sup>20</sup> A demonstration of eligibility must comply with the

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<sup>16</sup> See *Lifeline Reform Order*, ¶101; section 54.410.(b)(1)(i)(B).

<sup>17</sup> See *Lifeline Reform Order*, ¶101; sections 54.410(b)(1)(iii), 54.410(c)(1)(iii).

<sup>18</sup> See *Lifeline Reform Order*, ¶101; sections 54.410(b)(1)(ii), 54.410(c)(1)(ii).

<sup>19</sup> See *id.*

<sup>20</sup> See *Lifeline Reform Order*, ¶ 143; section 54.405(e)(1).

annual verification procedures below and found in new rule section 54.410(f), including the submission of a certification form. If a customer contacts the Company and states that he or she is not eligible for Lifeline or wishes to de-enroll for any reason, the Company will de-enroll the customer within five business days. Customers can make this request by calling the Company's customer service number and will not be required to submit any documents.

### **C. Subscriber Certifications for Enrollment**

The Company will implement certification policies and procedures that enable consumers to demonstrate their eligibility for Lifeline assistance to Company personnel as detailed in the *Lifeline Reform Order*, together with any additional state certification requirements.<sup>21</sup> The Company shares the Commission's concern about abuse of the Lifeline program and is thus committed to the safeguards stated herein, with the belief that these procedures will prevent the Company's customers from engaging in such abuse of the program, inadvertently or intentionally. As described above, every applicant will be required to complete an application/certification form containing disclosures, and collecting certain information and certifications as discussed below.<sup>22</sup> Applicants that seek to enroll based on income eligibility will be referred to a worksheet showing the Federal Poverty Guidelines by household size.<sup>23</sup> Company personnel will verbally explain the certifications to consumers when they are enrolling over the phone.<sup>24</sup>

Disclosures. The Company's application and certification forms will include the following disclosures: (1) Lifeline is a federal benefit and willfully making false statements to

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<sup>21</sup> *Lifeline Reform Order*, ¶ 61; section 54.410(a).

<sup>22</sup> *See* Model Application/Certification Form, included as Exhibit A. *See* Compliance Plan Public Notice at 3.

<sup>23</sup> *See* Income Eligibility Worksheet, included as Exhibit B.

<sup>24</sup> *See Lifeline Reform Order*, ¶ 123.

obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program; (2) only one Lifeline service is available per household; (3) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses; (4) a household is not permitted to receive Lifeline benefits from multiple providers; (5) violation of the one-per-household limitation constitutes a violation of the Commission's rules and will result in the applicant's de-enrollment from the program; and (6) Lifeline is a non-transferable benefit and the applicant may not transfer his or her benefit to any other person.<sup>25</sup>

Applications and certification forms will also state that: (1) the service is a Lifeline service, (2) Lifeline is a government assistance program, and (3) only eligible consumers may enroll in the program.<sup>26</sup>

In addition, the Company will notify the applicant that the prepaid service must be personally activated by the subscriber and the service will be deactivated and the subscriber de-enrolled if the subscriber does not use the service for 60 days.<sup>27</sup>

Information Collection. The Company will also collect the following information from the applicant in the application/certification form: (1) the applicant's full name; (2) the applicant's full residential address (P.O. Box is not sufficient<sup>28</sup>); (3) whether the applicant's residential address is permanent or temporary; (4) the applicant's billing address, if different from the applicant's residential address; (5) the applicant's date of birth; (6) the last four digits of the applicant's Social Security number (or the applicant's Tribal identification number, if the

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<sup>25</sup> See *id.*, ¶ 121; section 54.410(d)(1).

<sup>26</sup> See section 54.405(c).

<sup>27</sup> See *Lifeline Reform Order*, ¶ 257.

<sup>28</sup> See *Lifeline Reform Order*, ¶ 87.

subscriber is a member of a Tribal nation and does not have a Social Security number); (7) if the applicant is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from which the applicant, his or her dependents, or his or her household receives benefits; and (8) if the applicant is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.<sup>29</sup>

Applicant Certification. Consistent with new rule section 54.410(d)(3), the Company will require the applicant to certify, under penalty of perjury, in writing or by electronic signature or interactive voice response recording,<sup>30</sup> the following: (1) the applicant meets the income-based or program-based eligibility criteria for receiving Lifeline; (2) the applicant will notify the Company within 30 days if for any reason he or she no longer satisfies the criteria for receiving Lifeline including if the applicant no longer meets the income-based or program-based criteria for receiving Lifeline support, the applicant is receiving more than one Lifeline benefit, or another member of the applicant's household is receiving a Lifeline benefit; (3) if the applicant is seeking to qualify for Lifeline as an eligible resident of Tribal lands, he or she lives on Tribal lands; (4) if the applicant moves to a new address, he or she will provide that new address to the Company within 30 days; (5) the applicant, if providing a temporary address, will verify their address every 90 days; (6) the applicant's household will receive only one Lifeline service and, to the best of the applicant's knowledge, the applicant's household is not already receiving a Lifeline service; (7) the information contained in the applicant's certification form is true and correct to the best of the applicant's knowledge; (8) the applicant acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and (9) the applicant acknowledges that the applicant may be required to re-certify his or her continued

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<sup>29</sup> See section 54.410(d)(2).

<sup>30</sup> See *Lifeline Reform Order*. ¶¶ 168-69; section 54.419.

eligibility for Lifeline at any time, and the applicant's failure to re-certify as to the applicant's continued eligibility will result in de-enrollment and the termination of the applicant's Lifeline benefits pursuant to the de-enrollment policy included below and in the Commission's rules.

In addition, the applicant will be required to authorize the Company to access any records required to verify the applicant's statements on the application/certification form and to confirm the applicant's eligibility for Lifeline. The applicant must also authorize the Company to release any records required for the administration of the Company Lifeline service, including to USAC to be used in a Lifeline program database.<sup>31</sup>

#### **D. Annual Verification Procedures**

North American Local will annually re-certify all subscribers by querying the appropriate eligibility databases or obtaining a signed certification from each subscriber consistent with the certification requirements above and new section 54.410(d) of the Commission's rules. This certification will include a confirmation that the applicant's household will receive only one Lifeline service and, to the best of the subscriber's knowledge, the subscriber's household is receiving no more than one Lifeline service.<sup>32</sup> Further, the verification materials will inform the subscriber that he or she is being contacted to re-certify his or her continuing eligibility for Lifeline and if the subscriber fails to respond, he or she will be de-enrolled in the program.<sup>33</sup>

Verification De-Enrollment. North American Local will de-enroll subscribers that do not respond to the annual verification or fail to provide the required certification.<sup>34</sup> The Company

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<sup>31</sup> See Section 54.404(b)(9). The application/certification form will also describe the information that will be transmitted, that the information is being transmitted to USAC to ensure the proper administration of the Lifeline program and that failure to provide consent will result in the applicant being denied the Lifeline service. *See id.*

<sup>32</sup> *See Lifeline Reform Order*, ¶ 120.

<sup>33</sup> *See id.*, ¶ 145.

<sup>34</sup> *See id.*, ¶ 142; section 54.54.405(e)(4).

will give subscribers 30 days to respond to the annual verification inquiry. If the subscriber does not respond, the Company will send a separate written notice explaining that failure to respond within 30 days will result in the subscriber's de-enrollment from the Lifeline program. If the subscriber does not respond within 30 days, the Company will de-enroll the subscriber within five business days.

#### **E.      Activation and Non-Usage**

North American Local will not consider a prepaid subscriber activated, and will not seek reimbursement for Lifeline for that subscriber, until the subscriber activates the Company's prepaid service by completing an outbound call. An outbound call must be made in order for the service to be activated and for North American Local to seek Lifeline reimbursement for that customer. For phones sold in-person, the customer must complete an outbound call in front of the representative upon taking possession of the phone in order to complete the enrollment process. In the event phones are mailed to the customer's address, the customer must dial an activation code which will connect them to a customer service representative. The customer then has to provide the customer service representative with identification information and confirm Lifeline service was ordered.

Further, after service activation, the Company will provide a de-enrollment notice to subscribers that have not used their service for 60 consecutive days.<sup>35</sup> After 60 days of non-use, the Company will provide notice to the subscriber that failure to use the Lifeline service within a 30-day notice period will result in de-enrollment.<sup>36</sup> Subscribers can "use" the service by: (1) completing an outbound call; (2) purchasing minutes from the Company to add to the subscriber's plan; (3) answering an incoming call from a party other than the Company; or (4)

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<sup>35</sup> Currently, North American Local's de-enrollment due to non-usage is less than four percent.

<sup>36</sup> See *Lifeline Reform Order*, ¶ 257; section 54.405(e)(3).

responding to a direct contact from the Company and confirming that the subscriber wants to continue receiving the service.<sup>37</sup> If the subscriber does not respond to the notice, the subscriber will be de-enrolled and the Company will not request further Lifeline reimbursement for the subscriber. The Company will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.<sup>38</sup>

In addition to the above, North American Local's usage team identifies accounts that have not been used for 30 days and sends a text message to such customers asking the customers to respond to the text message or call North American Local's customer service number within 30 days to keep their account active. After 45 days of non-usage, North American Local's internal outreach team attempts to contact the customer to inquire about the customer's intentions to retain the service. North American Local will not seek to recover a Federal Universal Service Fund subsidy for the minutes provided to the customer during the grace period or thereafter report that customer on its USAC Form 497 unless the customer reinitiates service.

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<sup>37</sup> See *Lifeline Reform Order*, ¶ 261; section 54.407(c)(2).

<sup>38</sup> See *Lifeline Reform Order*, ¶ 257; section 54.405(e)(3).

**F. Additional Measures to Prevent Waste, Fraud and Abuse**

To supplement its verification and certification procedures, and to better ensure that customers understand the Lifeline service restrictions with respect to duplicates, North American Local will implement measures and procedures to prevent duplicate Lifeline benefits being awarded to the same household. These measures entail additional emphasis in written disclosures as well as live due diligence.

In addition to checking the database when it becomes available, and as discussed above, Company personnel will emphasize the “one Lifeline phone per household” restriction in their direct sales contacts with potential customers. Training materials will include a discussion of the limitation to one Lifeline phone per household, and the need to ensure that the customer is informed of this restriction. All Company personnel interacting with existing and potential Lifeline customers will undergo training regarding the eligibility and certification requirements in the *Lifeline Reform Order* and this Compliance Plan. These personnel must sign a statement agreeing not to take part in any fraud with respect to Lifeline enrollment process. Employees must sign and return to North American Local the Acknowledgement of Receipt of the training manual that they receive as part of this training.

National Lifeline Accountability Database. North American Local will comply with the requirements of rule section 54.404. The Company will query the National Database to determine whether a prospective subscriber is currently receiving a Lifeline service from another



ETC and whether anyone else living at the prospective subscriber's residential address is currently receiving Lifeline service.<sup>39</sup>

One-Per-Household. The Company will implement the requirements of the *Lifeline Reform Order* to ensure that it provides only one Lifeline benefit per household<sup>40</sup> through the use of its application and certification forms discussed above, database checks and its marketing materials discussed below. Upon receiving an application for the Company's Lifeline service, the Company will search its own internal records to ensure that it does not already provide Lifeline-supported service to any individual at the same residential address.<sup>41</sup> In the event that the applicant lives at an address with multiple households, the Company will require the applicant to complete and submit a multiple household worksheet containing the following: (1) an explanation of the Commission's one-per-household rule; (2) a check box that an applicant can mark to indicate that he or she lives at an address occupied by multiple households; (3) a space for the applicant to certify that he or she shares an address with other adults who do not contribute income to the applicant's household and share in the household's expenses or benefit from the applicant's income, pursuant to the Commission's definition; and (4) the penalty for a consumer's failure to make the required one-per-household certification (*i.e.*, de-enrollment).<sup>42</sup>

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<sup>39</sup> See *Lifeline Reform Order*, ¶ 203. Company will also transmit to the National Database the information required for each new and existing Lifeline subscriber. See *Lifeline Reform Order*, ¶¶ 189-195; section 54.404(b)(6). Further, Company will update each subscriber's information in the National Database within ten business days of any change, except for de-enrollment, which will be transmitted within one business day. See section 54.404(b)(8),(10).

<sup>40</sup> A "household" is any individual or group of individuals who are living together at the same address as one economic unit. A household may include related and unrelated persons. An "economic unit" consists of all adult individuals contributing to and sharing in the income and expenses of a household. An adult is any person eighteen years or older. If an adult has no or minimal income, and lives with someone who provides financial support to him/her, both people shall be considered part of the same household. Children under the age of eighteen living with their parents or guardians are considered to be part of the same household as their parents or guardians. See *Lifeline Reform Order*, ¶ 74; section 54.400(h).

<sup>41</sup> See *Lifeline Reform Order*, ¶ 78.

<sup>42</sup> *Id.* The USAC worksheet is available at <http://www.usac.org/li/tools/news/default.aspx#582>.

In addition, Company personnel will inform each Lifeline applicant that he or she may be receiving Lifeline support under another name, and facilitate the applicant's understanding of what constitutes "Lifeline-supported services," and ability to determine whether he or she is already benefiting from Lifeline support, by informing the consumer that all Lifeline services may not be currently marketed under the name Lifeline. North American Local will also ask each customer whether they are receiving Lifeline service from one of the other major Lifeline providers in the state (*e.g.*, SafeLink, Assurance).

Marketing Materials. The Company will include, in clear, easily understood language, the following information regarding its Lifeline service on all marketing materials describing the service: (1) it is a Lifeline service, (2) Lifeline is a government assistance program, (3) the service is non-transferable, (4) only eligible consumers may enroll in the program, (5) the program is limited to one discount per household; (6) that documentation is necessary for enrollment; and (7) North American Local's name (the ETC).<sup>43</sup> These statements will be included in all print, radio, television and web materials (including social networking media) used to describe or enroll customers in the Company's Lifeline service offering, as well as the Company's application forms and certification forms.<sup>44</sup> This specifically includes the Company's website ([www.NorthAmericanLocal.com](http://www.NorthAmericanLocal.com)) and outdoor signage.<sup>45</sup> A sample of the Company's marketing materials is included as Exhibit D. In addition, the Company's application/certification form will state that consumers who willfully make a false statement in order to obtain the Lifeline benefit may be punished by fine or imprisonment or may be barred from the program.

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<sup>43</sup> See *Lifeline Reform Order*, ¶ 275; section 54.405(c).

<sup>44</sup> *Id.*

<sup>45</sup> *Id.*

## **G. Company Reimbursements From the Fund**

To ensure that North American Local does not seek reimbursement from the Fund without a subscriber's consent, the Company will certify, as part of each reimbursement request, that it is in compliance with all of the Commission's Lifeline rules and, to the extent required, has obtained valid certification and verification forms from each of the subscribers for whom it is seeking reimbursement.<sup>46</sup> Further, the Company will, using the snapshot date subscriber information,<sup>47</sup> submit its FCC Forms 497 on the eighth day of each month in order to be reimbursed the same month.<sup>48</sup>

In addition, the Company will keep accurate records as directed by USAC<sup>49</sup> and as required by new section 54.417 of the Commission's rules. For example, North American Local will keep the following records for each subscriber's individual Lifeline account, among other records, if applicable and as permitted: 1) date that North American Local queried the duplicates database; 2) date and information that North American Local transmitted to the duplicates database; 3) date of transmission of updated customer information to database; 4) date and database upon which North American Local determined income-based eligibility where available; 5) date and documentation/data source used to determine income-based eligibility if no database was available to determine subscriber eligibility;<sup>50</sup> 6) date, database, and program on which the Company determined subscriber eligibility; 7) date and records detailing the documentation a subscriber provided to demonstrate Lifeline eligibility; 8) state Lifeline

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<sup>46</sup> See *Lifeline Reform Order*, ¶ 128; section 54.407(d).

<sup>47</sup> See *Lifeline and Link Up Reform and Modernization*, 30 FCC Rcd 7818, 7898 (2015) ("... we revise section 54.407 and direct ETCs to take a snapshot of their subscribers on the first day of the month.").

<sup>48</sup> See *Lifeline Reform Order*, ¶¶ 302-306.

<sup>49</sup> See section 54.407(e).

<sup>50</sup> Such documentation includes the documentation listed in Section I.B. *supra*.

administrator documentation of customer eligibility, and subscriber's certification of eligibility; 9) date of customer service activation; 10) application/certification and annual re-certification forms for each subscriber associated with a date and time of signature; and 11) date of transmission of customer de-enrollment to database.

## **H. Annual Company Certifications**

North American Local will submit an annual certification to USAC, signed by a Company officer under penalty of perjury, that the Company: (1) has policies and procedures in place to review consumers' documentation of income- and program-based eligibility and ensure that its Lifeline subscribers are eligible to receive Lifeline services;<sup>51</sup> (2) is in compliance with all federal Lifeline certification procedures;<sup>52</sup> and (3) has obtained a valid certification form for each subscriber for whom the carrier seeks Lifeline reimbursement.<sup>53</sup>

In addition, the Company will provide the results of its annual re-certifications/verifications on an annual basis to the Commission, USAC, the applicable state commission and the relevant Tribal governments (for subscribers residing on Tribal lands).<sup>54</sup> Further, as discussed above, North American Local will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.<sup>55</sup>

The Company will also annually report to the Commission, USAC, and relevant state commissions and the relevant authority in a U.S. territory or Tribal government as appropriate,<sup>56</sup> the company name, names of the company's holding company, operating companies and

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<sup>51</sup> See *Lifeline Reform Order*, ¶ 126; section 54.416(a)(1).

<sup>52</sup> See *Lifeline Reform Order*, ¶ 127; section 54.416(a)(2).

<sup>53</sup> See section 54.416(a)(3).

<sup>54</sup> See *Lifeline Reform Order*, ¶¶ 132, 148; section 54.416(b).

<sup>55</sup> See *Lifeline Reform Order*, ¶ 257; section 54.405(e)(3).

<sup>56</sup> See section 54.422(c).

affiliates, and any branding (such as a “dba” or brand designation) as well as relevant universal service identifiers for each entity by Study Area Code.<sup>57</sup> The Company will report annually information regarding the terms and conditions of its Lifeline plans for voice telephony service offered specifically for low-income consumers during the previous year, including the number of minutes provided and whether there are additional charges to the consumer for service, including minutes of use and/or toll calls.<sup>58</sup> Finally, the Company will annually provide detailed information regarding service outages in the previous year, the number of complaints received and certification of compliance with applicable service quality standards and consumer protection rules, as well as a certification that the Company is able to function in emergency situations.<sup>59</sup>

## **I. Cooperation with State and Federal Regulators**

North American Local will cooperate with federal and state regulators to prevent waste, fraud and abuse. More specifically, the Company will:

- Obtain customer consent to provide and make available, upon request, state-specific subscriber data, including the names and addresses of Lifeline subscribers, to USAC and to each state public utilities commission where the Company operates for the purpose of determining whether an existing Lifeline subscriber receives Lifeline service from another carrier;<sup>60</sup>
- Assist the Commission, USAC, state commissions, and other ETCs in resolving instances of duplicative enrollment by Lifeline subscribers, including by providing to USAC and/or any state commission, upon request, the necessary information to detect and resolve duplicative Lifeline claims;

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<sup>57</sup> See *Lifeline Reform Order*, ¶¶ 296, 390; section 54.422(a).

<sup>58</sup> See *Lifeline Reform Order*, ¶ 390; section 54.422(b)(5).

<sup>59</sup> See *Lifeline Reform Order*, ¶ 389; section 54.422(b)(1)-(4).

<sup>60</sup> The Company anticipates that the need to provide such information will sunset following the implementation of the national duplicates database.

- Promptly investigate any notification that it receives from the Commission, USAC, or a state commission to the effect that one of its customers already receives Lifeline services from another carrier; and
- Immediately de-enroll any subscriber whom the Company has a reasonable basis to believe<sup>61</sup> is receiving Lifeline-supported service from another ETC or is no longer eligible – whether or not such information is provided by the Commission, USAC, or a state commission.

## II. Description of Lifeline Service Offering<sup>62</sup>

The Company will offer its Lifeline service in the states where it is designated as an ETC and throughout the coverage area of the Sprint footprint. North American Local's Lifeline offering will provide all non-Tribal customers with 300 anytime prepaid minutes per month at no charge, with text messaging at a rate of 1 text per voice minute. Tribal customers will get 1,000 anytime prepaid minutes per month, with text messaging at a rate of 1 text per voice minute.

North American Local is committed to expanding Lifeline services to the vastly underserved Tribal communities in Alabama.<sup>63</sup> On April 2, 2013, the Company received approval from the Alabama Public Service Commission to expand its service area to include tribal lands.<sup>64</sup> According to a 2010 Census Brief, more than 57,000 residents claim tribal heritage in Alabama.<sup>65</sup> The latest statistics released by the Commission show that Alabama had only 130 Lifeline subscribers living on tribal lands in 2014 and there are few competitive options.<sup>66</sup> On June 4, 2014, the Company received facilities-based ETC approval in the State of

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<sup>61</sup> See section 54.405(e)(1).

<sup>62</sup> See Compliance Plan Public Notice at 3.

<sup>63</sup> There are nine state recognized tribes and one federally recognized tribe in Alabama. See <http://www.ncsl.org/issues-research/tribal/list-of-federal-and-state-recognized-tribes.aspx#State> (retrieved August 16, 2016).

<sup>64</sup> In re: Application of North American Local, LLC, Docket No. 31540, filed Apr. 1, 2011.

<sup>65</sup> *The American Indian and Alaska Native Population: 2010*, C2010BR-10, Table 2 (rel. Jan. 2012).

<sup>66</sup> *Universal Service Monitoring Report 2015*, CC Docket 96-45, Table 2.8 (rel. Dec. 22, 2015). As of July 31, 2016, North American Local has enrolled more than 700 tribal residents in Alabama. Most subscribers are members of the Poarch Band of Creek Indian tribe.

Wisconsin, has 11 federally recognized tribes.<sup>67</sup> North American Local has established direct relationships with numerous tribal governments, including Wisconsin's Lac Courte Oreilles Band of Lake Superior Chippewa Indians and Red Cliff Band of Lake Superior Chippewa Indians, who offer letters of reference/support regarding North American Local's Lifeline customer service.<sup>68</sup>

In addition to providing voice services, North American Local will provide broadband services to its Lifeline subscribers via the Sprint broadband LTE network. North American Local offers data speeds at both 3G and 4G/LTE data speeds. North American Local will provide broadband network access across multiple LTE, WiMAX and CDMA devices. North American Local delivers average download speeds of 6 to 8 Mbps with peak speeds of 23 Mbps along with upload speeds of 2 to 3 Mbps. North American Local will provide broadband network access across multiple LTE, WiMAX and CDMA devices.

Lifeline customers can purchase additional bundles of minutes, referred to in North American Local's general terms and conditions as Replenishment plans. These Replenishment plans, or "top-up" minutes, will be available for purchase at North American Local's website, by speaking with a customer service representative or through an IVR via the Company's toll free number. Where text messaging is not included in a plan as a separate component, it is available with all North American Local voice plans at the rate of one (1) text, either sent or received, to one (1) minute of airtime usage.

In addition to free voice services, North American Local's Lifeline plan will include a free smartphone, capable of operating as a mobile Wi-Fi hotspot, and custom calling features,

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<sup>67</sup> <http://www.ncsl.org/research/state-tribal-institute/list-of-federal-and-state-recognized-tribes.aspx#State> (retrieved August 16, 2016).

<sup>68</sup> See Exhibit E.

including Caller ID, Call Waiting, Call Forwarding, 3-Way Calling, and Voicemail, at no charge. All plans include domestic long-distance at no extra per minute charge. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes.

### **III. Demonstration of Financial and Technical Capabilities and Certifications Required for ETC Designation<sup>69</sup>**

Financial and Technical Capabilities. Section 54.202(a)(4), 47 C.F.R. 54.202(a)(4), requires carriers petitioning for ETC designation to demonstrate financial and technical capability to comply with the Commission's Lifeline service requirements.<sup>70</sup> For purposes of demonstrating capability, the Commission will consider factors including a carrier's prior offering of service to non-Lifeline subscribers, the length of time the carrier has been in business, whether the carrier relies exclusively on Lifeline reimbursement to operate, whether the carrier receives revenues from other sources and whether the carrier has been the subject of an enforcement action or ETC revocation proceeding in any state.

North American Local is a privately held, limited liability corporation that has been in business since September 2010. North American Local does not have any holding companies, operating companies or affiliates. North American Local's management team has more than 40 years of combined telecommunications experience, including providing local and long distance services to residents of rural and urban areas, and in particular, to lower income individuals and families. The management team has extensive experience supporting the provisioning, marketing, fulfillment and customer service needs of its customer base. Managing partner, Jorge Bellas has been in the telecommunication industry for over 20 years and has been the CEO of various successful telecommunications companies. Mr. Bellas has a proven track record of

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<sup>69</sup> See Compliance Plan Public Notice at 3.

<sup>70</sup> See *Lifeline Reform Order*, ¶¶ 387-388 (revising Commission rule 54.202(a)(4)).



success managing telecommunications companies since 1992 and is committed to developing North American Local into profitable enterprise.

North American Local receives revenue from a number of sources which are completely independent from the revenue it will receive in the form of Lifeline reimbursements. The Company's revenue streams include income from the sale of telecommunications services to small businesses and residential customers (approximately [[8,000]] in the state of Alabama). The small business services include, but are not limited to, inbound and outbound call center and live operator services, residential and wholesale long distance and voice transport services, CLEC and IXC consulting services and wholesale vendor/major accounts management and wireless services. Consequently, North American Local generates its revenues from a diverse product portfolio, is both financially stable and profitable, and is not relying exclusively on Lifeline reimbursements for its operating revenues. The Company has not been subject to enforcement sanctions or ETC revocation proceedings in any state.

Service Requirements Applicable to Company's Support. The Compliance Plan Public Notice requires carriers to include "certifications required under newly amended section 54.202 of the Commission's rules."<sup>71</sup> North American Local certifies that it will comply with the service requirements applicable to the support the Company receives.<sup>72</sup> The Company will provide all of the telecommunications service supported by the Lifeline program and will make the services available to all qualified consumers throughout the states in which it is designated as an ETC. The Company's services will include voice telephony services that provide voice grade access to the public switched network or its functional equivalent. Further, the Company's service offerings will provide its customers with a set number of minutes of use for local service

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<sup>71</sup> Compliance Plan Public Notice at 3.

<sup>72</sup> 47 C.F.R. § 54.202(a)(1).

at no charge to the customer. The Company's proposed Lifeline offerings include packages in Section II *supra* that can be used for local and domestic toll service.

The Company also will provide access to emergency services provided by local government or public safety officials, including 911 and E911 where available and will comply with any Commission requirements regarding E911-compatible handsets. As discussed above, the Company will comply with the Commission's forbearance grant conditions relating to the provision of 911 and E911 services and handsets.

Finally, the Company will not provide toll limitation service ("TLS"). North American Local, like most wireless carriers, does not differentiate domestic long distance toll usage from local usage and all usage is paid for in advance. Pursuant to the *Lifeline Reform Order*, subscribers to such services are not considered to have voluntarily elected to receive TLS.<sup>73</sup>

#### **IV. Conclusion**

North American Local submits that its Compliance Plan fully satisfies the conditions set forth in the Commission's *Lifeline Reform Order*, the Compliance Plan Public Notice and the Lifeline rules. Accordingly, the Company respectfully requests that the Commission expeditiously approve its Compliance Plan.

Respectfully submitted,

NORTH AMERICAN LOCAL, LLC

/s/

Glenn S. Richards

Pillsbury Winthrop Shaw Pittman LLP  
1200 Seventeenth Street NW  
Washington D.C. 20036  
(202) 663-8215  
Its Counsel

August 23, 2016

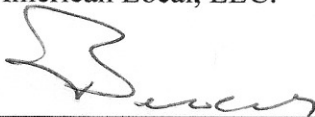
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<sup>73</sup> See *Lifeline Reform Order*, ¶ 230.

## VERIFICATION

I hereby verify that I have read the foregoing North American Local, LLC Compliance Plan; and that to the best of my knowledge, information and belief the information stated therein is true and accurate.

North American Local, LLC.

By: 

Title: MANAGING PARTNER

Date: 8/23/16

## **EXHIBIT A**



**North American Local**  
**[State] Wireless Lifeline Service Application and Certification**

Mail or fax form completed and signed form to:  
13430 Gulf Beach Hwy #79 Pensacola FL 32507  
Fax 1-877-372-2506 / Customer Service: 1-877-200-1367

A complete and signed Lifeline Service Application and Certification ("Certification") is required to enroll you in North American Local, LLC's (North American Local) Lifeline service program in your state. This Certification is for the purpose of verifying your eligibility for Lifeline service. Service requests will not be processed until this form has been received and verified by Company.

**One Lifeline service per household disclosures:** Lifeline is a government assistance program and willfully making false statements to obtain a Lifeline benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Lifeline benefits are limited to a single line of service per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household may not receive multiple Lifeline discounts. You may apply your Lifeline discount to either one landline or one wireless number, but you cannot have the discount on both and you cannot receive Lifeline benefits from multiple providers. Note that not all Lifeline services are currently marketed under the name Lifeline. Lifeline is a non-transferable benefit and you may not transfer your benefit to any other person, including another eligible low-income consumer. Violation of the one-per-household limitation constitutes a violation of the Federal Communications Commission's rules and will result in your de-enrollment from the program, and potentially prosecution by the United States Government.

☐ **I hereby certify that I have read and understand the disclosures listed above and that, to the best of my knowledge, my household is not already receiving a Lifeline service benefit.**

**Customer eligibility certification:** I hereby certify that I participate in at least one of the following programs (**check one**):

- |   |  |
|---|--|
| <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP)   | <input type="checkbox"/> Income at or below 135% of Federal Poverty Guidelines     |
| <input type="checkbox"/> Section 8 Federal Public Housing Assistance (FPHA) | <input type="checkbox"/> Food Distribution Program on Indian Reservations (FDPIR)  |
| <input type="checkbox"/> Medicaid (not Medicare)                            | <input type="checkbox"/> Bureau of Indian Affairs General Assistance (BIA)         |
| <input type="checkbox"/> Supplemental Security Income (SSI)                 | <input type="checkbox"/> Tribally Administered TANF (TATNF)                        |
| <input type="checkbox"/> Temporary Assistance for Needy Families (TANF)     | <input type="checkbox"/> Head Start (meeting income qualifying standards) (Tribal) |
| <input type="checkbox"/> Low Income Home Energy Assistance Program (LIHEAP) |  |
| <input type="checkbox"/> National School Lunch Program's free lunch program |  |

**Tribal eligibility:**

☐ I hereby certify that I reside on Federally-recognized Tribal lands.

**Customer Application Information:**

First Name: \_\_\_\_\_ Middle Name: \_\_\_\_\_ Last Name: \_\_\_\_\_  
Date of Birth ("DOB"): Month: \_\_\_\_ Day: \_\_\_\_ Year: \_\_\_\_ Last Four Digits of Social Security Number (or Tribal ID Number): \_\_\_\_\_  
If Qualifying for Lifeline by Income: Income Level : \_\_\_\_\_ AND Number of Individuals in the Household: \_\_\_\_\_  
Home Telephone Number (if available): \_\_\_\_\_

**Residential Address (P.O. Box NOT sufficient)**

Number: \_\_\_\_\_ Apt: \_\_\_\_\_ Street \_\_\_\_\_ City \_\_\_\_\_  
State: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
Address is (choose one): ☐ Permanent ☐ Temporary

**Billing Address (if different from Residential Address) (P.O. Box IS sufficient)**

Number: \_\_\_\_\_ Apt: \_\_\_\_\_ Street \_\_\_\_\_ City \_\_\_\_\_  
State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

**Multiple households sharing and address:**

☐ I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete and include with this application multiple household worksheet.

**Activation and usage requirement disclosures:** This service is a prepaid service and you must personally activate it by calling [IVR 800 Number]. To keep your account active, you must use your Lifeline service at least once during any 60 consecutive day period by completing an outbound call, purchasing additional minutes from Company, answering an in-bound call from someone other than

Company, or by responding to a direct contact from Company confirming that you want to continue receiving Lifeline service from Company. If your service goes unused for 60 consecutive days, you will no longer be eligible for Lifeline benefits and your service will be suspended (allowing only 911 calls and calls to the Company's customer care center) subject to a 30 day cure period during which you may use the service (as described above) or contact the Company to confirm that you want to continue receiving Lifeline service from Company.

☐ I hereby certify that I have read and understand the disclosures listed above regarding the Lifeline service activation and usage requirements.

**Authorizations:**

☐ I hereby authorize the Company to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline program. I also authorize the Company to release any records required for the administration of the Lifeline program (e.g., name, telephone number, address, DOB, Lifeline enrollment and termination dates and the means through which the applicant qualified for Lifeline (i.e. Medicare or income)), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.

**Additional certifications:** I hereby certify, under penalty of perjury, that (check each box):

- ☐ I meet the income-based or program-based eligibility criteria for receiving Lifeline service and have provided documentation of eligibility if required
- ☐ I will notify the Company within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based eligibility criteria, I begin receiving more than one Lifeline benefit, or another member of my household is receiving a Lifeline benefit. I understand that I may be subject to penalties if I fail to follow this requirement
- ☐ I am not listed as a dependent on another person's tax return (unless over the age of 60)
- ☐ The address listed below is my primary residence, not a second home or business
- ☐ If I move to a new address, I will provide that new address to the Company within 30 days
- ☐ If I provided a temporary residential address to the Company, I will verify my temporary residential address every 90 days
- ☐ I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law
- ☐ I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and my failure to re-certify as to my continued eligibility within 30 days will result in de-enrollment and the termination of my Lifeline benefits
- ☐ The information contained in this certification form is true and correct to the best of my knowledge

**Applicant's Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**For Agent Use Only (check the appropriate boxes for the proof of eligibility viewed and provide information requested):**

**Documents Acceptable Proof for Income-Eligibility (check 1):**

- ☐ The prior year's state, federal, or Tribal tax return,
- ☐ Current income statement from an employer or 3 consecutive months of paycheck stubs,
- ☐ A Social Security statement of benefits,
- ☐ A Veterans Administration statement of benefits,
- ☐ A retirement/pension statement of benefits,
- ☐ An Unemployment/Workmen's Compensation statement of benefits,
- ☐ Federal or Tribal notice letter of participation in General Assistance, or
- ☐ A divorce decree, child support award, or other official document containing income information for at least three months time.

**Documents/Benefit Cards Acceptable Proof for Program-Eligibility (choose 1 from each list A and B below):**

List A - Choose 1

- ☐ Supplemental Nutrition Assistance Program (SNAP)
- ☐ Medicaid
- ☐ Section 8 Federal Public Housing Assistance (FPHA)
- ☐ Supplemental Security Income (SSI)
- ☐ Temporary Assistance for Needy Families (TANF)
- ☐ Low Income Home Energy Assistance Program (LIHEAP)
- ☐ National School Lunch Program's free lunch program
- ☐ Food Distribution Program on Indian Reservations (FDPPIR)
- ☐ Bureau of Indian Affairs General Assistance (BIA)
- ☐ Tribally Administered TANF (TATNF)
- ☐ Head Start (meeting income qualifying standards)
- ☐ State Program 1
- ☐ State Program 2

List B - Choose 1:

- ☐ Program participation card/document
- ☐ Prior year's statement of benefits
- ☐ Notice letter of participation
- ☐ Other official document evidencing participation \_\_\_\_\_

Last 4 digits of Document from List B \_\_\_\_\_

Date of Proof Document: \_\_\_\_/\_\_\_\_/\_\_\_\_

Expiration Date of Proof Document: \_\_\_\_/\_\_\_\_/\_\_\_\_

Applicant Account Number	Rep/Agent Signature

## **EXHIBIT B**

## North American Local Lifeline Service Application Income Eligibility Worksheet

Individuals in all states are able to enroll in the Lifeline program by demonstrating that their household's annual income is at or below 135% of the Federal Poverty Guidelines. This table should be used to determine whether a Lifeline applicant is eligible for Lifeline service based on the number of individuals in the applicant's household and the applicant's household annual income:

HOUSEHOLD SIZE	INCOME LEVEL
1	\$15,080
2	\$20,426
3	\$25,772
4	\$31,118
5	\$36,464
6	\$41,810
7	\$47,156
8	\$52,502
For each additional person	Add \$5,346

**Applicants must list the number of individuals in the applicant's household on the Lifeline application form.** Applicants seeking to qualify for Lifeline service based on their household income must present one of the following documents in order to prove eligibility:

- the prior year's state, federal, or Tribal tax return
- current income statement from an employer or paycheck stub
- a Social Security statement of benefits
- a Veterans Administration statement of benefits
- a retirement/pension statement of benefits
- an Unemployment/Workmen's Compensation statement of benefits
- Federal or Tribal notice letter of participation in General Assistance
- a divorce decree, child support award, or other official document containing income information for at least three months time

**This is a Lifeline service provided by North American Local, LLC. Lifeline is a government assistance program. Only one Lifeline service is available per household. Households are not permitted to receive multiple Lifeline benefits whether they are from one or multiple companies, wireless or wireline. Proof of eligibility is required for enrollment and only eligible customers may enroll in Lifeline service. Consumers who willingly make false statements to obtain the benefit can be punished by fine or imprisonment or can be barred from the program. Lifeline is a non-transferable benefit. Lifeline customers may not transfer their benefits to any other person.**



## **EXHIBIT C**

## Call Center Scripts

1. Thank you for calling North American Local, how may we assist you today?
2. I will be able to assist you in the enrollment process. I will need to ask you some questions to get started. Is that ok?
3. Is there anyone currently residing in your household that is receiving Lifeline benefits for wireless or home phone service from any other companies such as Assurance, Safelink or Reachout Wireless? Is this individual part of your household [explain definition of “household”<sup>1</sup>]?

If no, proceed to #4

If yes, **Lifeline service is only available to one person per residence. If you would like to receive Lifeline service from North American Local, please contact your current Lifeline provider and cancel the service. Once you cancel that service, please contact us to set up your North American Local Lifeline service. Or you must separately certify, in writing (use USAC form), that those individuals do not contribute income to your household OR share your household expenses.**

4. Now sir/ma'am in order to receive the North American Local Lifeline service, you must be enrolled in select government assistance programs. Are you currently participating in any government assistance programs? If so, which one? Or is your income 135% below the Federal Poverty Guide Lines? If yes, proceed to #5.
5. Participating in the **[insert program here]** program enables you to receive the North American Local Lifeline service. The North American Local Lifeline service will provide you with a free wireless phone and 250 monthly voice minutes.
6. *(Enrollment Representative takes customer's information and checks against database prior to entering the enrollment process)*
  - a. May I please have your first name?
  - b. Middle Initial (optional)
  - c. May I please have your last name?
  - d. May I please have your mailing address? (must be residential, not P O Box)
  - e. Is your billing address the same? If not, please provide your billing address.
  - f. May I please have your contact phone number, if available?
  - g. May I please have your email address?

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<sup>1</sup> A “household” is any individual or group of individuals who are living together at the same address as one economic unit. A household may include related and unrelated persons. An “economic unit” consists of all adult individuals contributing to and sharing in the income and expenses of a household. Order at ¶74.

- h. What are the last 4 digits of your social security number or your Tribal government identification card number? This is required to check the status on your application and for security verification purposes.
  - i. What is your date of birth? This is also required for verification purposes.
  - j. What is the government assistance program from which you receive assistance? PROCCED to #7
7. Now that we have verified all of your information, we can complete your enrollment. In order to do so:

***(At this point the Enrollment Representative will ask self-certification questions in 3 parts to ensure the customer understands)***

8. DO YOU CERTIFY UNDER PENALTY OF PURJURY THAT THE INFORMATION CONTAINED WITHIN THIS APPLICATION IS TRUE AND CORRECT TO THE BEST OF HIS OR HER KNOWLEDGE AND THAT NO OTHER MEMBER IN YOUR HOUSEHOLD CURRENTLY RECEIVES LIFELINE ASSISTANCE?

Customer must answer YES to continue.

9. DO YOU UNDERSTAND THAT YOU MAY BE REQUIRED TO VERIFY YOUR CONTINUED ELIGIBILITY FOR NORTH AMERICAN LOCAL LIFELINE SERVICE AT ANY TIME? FAILURE TO VERIFY ELIGIBILITY WILL RESULT IN TERMINATION OF NORTH AMERICAN SERVICE. IN THE FUTURE, IF YOU ARE NO LONGER ELIGIBLE TO RECEIVE BENEFITS FROM AT LEAST ONE OF THE QUALIFYING STATE OR FEDERAL ASSISTANCE PROGRAMS OR YOUR INCOME EXCEEDS MORE THAN 135% OF THE FEDERAL POVERTY GUIDELINES, AS PREVIOUSLY EXPLAINED TO YOU, YOU WILL NOTIFY NORTH AMERICAN LOCAL WITHIN THIRTY (30) DAYS.

Customer must answer YES to continue.

10. DO YOU UNDERSTAND AND AGREE TO NOTIFY NORTH AMERICAN LOCAL WITHIN 30 DAYS OF MOVING?

Customer must answer YES to continue.

11. DO YOU UNDERSTAND, AND CONSENT TO, THAT IF APPROVED FOR LIFELINE SERVICE, YOUR PERSONAL INFORMATION, INCLUDING NAME, DATA OF BIRTH, LAST FOUR DIGITS OF YOUR SOCIAL SECURITY NUMBER OR TRIBAL IDENTIFICATION CARD NUMBER, ADDRESS, WILL BE PROVIDED TO THE LIFELINE PROGRAM ADMINISTRATOR FOR PURPOSES OF DETERMINING DUPLICATE SERVICES.

Customer must answer YES to continue.

12. DO YOU UNDERSTAND THAT IF YOUR LIFELINE SERVICE GOES UNUSED FOR (60) SIXTY DAYS, YOUR SERVICE WILL BE SUSPENDED AND SUBJECT TO A (30) THIRTY DAY PERIOD DURING WHICH YOU MAY USE THE SERVICE OR CONTACT NORTH AMERICAN LOCAL TO CONFIRM ONGOING USE?

Customer must answer YES to continue.

13. DO YOU UNDERSTAND THAT LIFELINE IS A FEDERAL BENEFIT AND MAY NOT BE TRANSFERRED TO ANOTHER INDIVIDUAL, INCLUDING ANOTHER ELIGIBLE CONSUMER?

Customer must answer YES to continue.

14. DO YOU ACKNOWLEDGE THAT PROVIDING FALSE OR FRAUDULENT DOCUMENTATION IN ORDER TO RECEIVE ASSISTANCE IS PUNISHABLE BY LAW AND THE PENALTIES OF PURJURY INCLUDE MONETARY FINES AND POTENTIAL IMPRISONMENT?

Customer must say YES to continue.

If at any point, the customer says “NO” to the self-certification questions, the Enrollment representative will explain that the customer does not qualify for the North American Local Lifeline program.

## **EXHIBIT D**

[Already a customer?](#)

**NORTH AMERICAN LOCAL** powered by

This is a Lifeline service. Lifeline is a government assistance program that is non-transferable. Only eligible consumers may enroll in the program. This program is limited to one discount per household. Contact us now and complete the documentation that is necessary for enrollment. If you participate in one of the below programs you may qualify.

Medicaid, Supplemental Nutrition Assistance Program (SNAP), Supplemental Security Income (SSI), Federal Public Housing Assistance, Low Income Home Energy Assistance Program (LIHEAP), Temporary Assistance for Needy Families (TANF), National School Lunch Program (free lunch program only), Children's Health Insurance Program (CHIP), Bureau of Indian Affairs General Assistance, Tribally-Administered Temporary Assistance for Needy Families (TTANF), Food Distribution Program on Indian Reservations (FDPIR), b. Income-based Eligibility,

**CALL NOW**

## Sprint Network

- With 50.5 million subscribers, Sprint's network is top-ranked
- Sprint ranked #3 among the 500 greenest US companies - Newsweek, 2011

Click Here for [Sprint's coverage map](#)

## Lifeline Cellular Plans

Wireless ETC 1,000 minutes Tribal	Wireless ETC 300 minutes Non-Tribal	Home Phone ETC Unlimited Local (Alabama only)	Wireless TopUps
\$0.00 Free	\$0.00 Free	\$24.24	100 Minutes \$4.99 200 Minutes \$10.44 300 Minutes \$15.99
* with approved Lifeline Discount	* with approved Lifeline Discount	plus taxes & fees * with approved Lifeline Discount	plus taxes & fees * with approved Lifeline Discount

\*Eligible subscribers may only receive low-income assistance from one wireline or wireless telephone plan. The lifeline discount can be applied to any eligible plan offered by North American Local to reduce the cost of the eligible service.

## Lifeline Discounted Home Phone Service



\$24.24 Gets You Started with Unlimited Local Calling, Call Waiting & Caller ID!

### Long Distance Packages:

- 100 minutes of rollover - \$1 per month
- 300 minutes of rollover - \$3 per month
- 500 minutes of rollover - \$5 per month

**Call Us Now**


**Bundle with North American Local, LLC & the Government's Lifeline Program Discount**

## Do You Like Saving Money?

Get More And Pay Less with North American Local, LLC!

Wireless ETC 1,000 minutes Tribal	Wireless ETC 300 minutes Non-Tribal	Home Phone ETC Unlimited Local (Alabama only)	Wireless TopUps
\$0.00 Free	\$0.00 Free	\$24.24	100 Minutes \$4.99 200 Minutes \$10.44 300 Minutes \$15.99
* with approved Lifeline Discount	* with approved Lifeline Discount	plus taxes & fees * with approved Lifeline Discount	plus taxes & fees * with approved Lifeline Discount

\*Eligible subscribers may only receive low-income assistance from one wireline or wireless telephone plan.  
The lifeline discount can be applied to any eligible plan offered by North American Local to reduce the cost of the eligible service.

## **EXHIBIT E**





*Pride Of The Ojibwa*  
13394 W Trepania Road  
Hayward • Wisconsin • 54843  
PHONE (715) 634-8934 • FAX (715) 634-4797

August 12, 2016

To Whom It May Concern;

It is my pleasure to write a letter of support for North American Local on behalf of the Lac Courte Oreilles Band of Lake Superior Chippewa Indians.

Over a year ago, North American Local presented Lac Courte Oreilles Tribe with the "free cell phone" program available to tribal members over 18 years of age and residing on the Reservation. This free life line cell phone program offered by North American Local has provided over 800+ tribal members with free cell phone service, which no other company has been able to offer Lac Courte Oreilles members.

North American Local has shown professionalism, knowledge and experience in working with Wisconsin Tribes. North American Local has worked with Lac Courte Oreilles Tribe and the experiences of families in need of free cell phone service and providing exceptional customer service to assist every member. Every customer is unique and each household is different and North American local has shown the respect in working with each tribe's unique household composition and Bureau of Indian Affairs/Indian Health Services tribal families.

In conclusion I would like to express that Lac Courte Oreilles has had nothing but a great experience working with North American Local who has been providing customer service to all the customers of Lac Courte Oreilles. I would strongly recommend North American Local to all communities. They've provided exemplary customer service to our members and have ensured that all members are satisfied with the service they are being provided.

If you have any questions or would like to speak directly, please feel free to contact me at 715-634-8934 Ext. 7458 or email me [teri.tainter@lco-nsn.gov](mailto:teri.tainter@lco-nsn.gov).

Sincerely,

Teri Tainter  
Lac Courte Oreilles, Program Director



## Red Cliff Band of Lake Superior Chippewa Indian

### Family/Human Service Division

Our Mission is to "Work collaboratively with compassion in providing a broad range of quality of life enhancing services to our tribal families, through out the four hills of life."

88385 Pike Road, HWY 13 N  
Bayfield WI 54814  
715-779-3706

August 16, 2016

**Division Administrator**  
Jeremy McClain  
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**Administrative Assistant**  
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**Department(s)**

**Elderly Programs**  
Grace Livingston  
715-779-3706 ext. 1245  
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**Youth Services**  
Misty Nordin  
715-779-3706 (office)  
715-779-3722 (hall)  
[krystaltopping@redcliff-nsn.gov](mailto:krystaltopping@redcliff-nsn.gov)

**Child Support**  
Alana Babineau  
715-779-3769  
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**Domestic/Family Violence**  
Lorna Gamble  
715-779-3706 ext. 1238  
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**Mino-Ayaa win Niihkana**  
Marvin Defoe  
715-779-3706 ext. 1261  
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**Brighter Futures Initiative & Coordinated Services Team Coordinator**  
Pete Newago  
715-779-3706 ext. 1267  
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**TANF/GA**  
Rebecca Benton  
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**Income Maintenance/ Energy Assistance**  
Holly Leask  
715-779-3706 ext. 1262  
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**Food Distribution/ Nutrition Education**  
Peggy Bazant  
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**Indian Child Welfare**  
Leah Thaldorf, MSW  
715-779-3785  
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To whom it may concern,

On behalf of the Red Cliff Family/Human Services Division of the Red Cliff Band of Lake Superior Chippewa, it is with enthusiasm that we support the "free cell phone" service through North American Local. Roger Lynn presented the program to our community back in January 2016 and we were very excited to offer the service to our community members.

Our members flooded the office's with the chance to receive "free cell phone" service, and did just that...receive free iPhones with service. With this service our members was able to get connected and reach out to those that they haven't heard from in awhile, families were able to reunite on the internet, phone call, and/or text messages.

Roger has been a great contact for North American Local, he's demonstrated knowledge, understanding, and professionalism with all clients. We are very satisfied with North American Local and the service they have offered our membership.

Our Family/Human Services Division strives to work collaboratively with compassion in providing a broad range of quality life enhancing services to our tribal families, through out the four hills of life. Therefore, utilizing North American Local service has brought our community to the 20th Century in iPhone services.

Sincerely,

**Denise Carlson**  
Administrative Assistant  
Family/Human Service Division  
Red Cliff Band of Lake Superior Chippewa  
715-779-3706 Ext. 1243  
[denise.carlson@redcliff-nsn.gov](mailto:denise.carlson@redcliff-nsn.gov)

Incorporating the seven teachings of the Anishinabeg into service and practice methods; Love (Zaagi), Respect (Oziibwaadenidiwin), Courage (Zoongide'e), Honesty (Gwayako Bimaadiziwin), Wisdom (Gikendaasowin), Humility (Nibwaakaawin) and Truth (Debwewin).